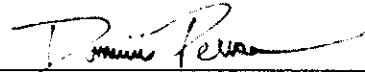


3. Please describe in detail EAI's plans to provide Broadband Over Power Line ("BPL") service. Please include in your answer what steps Entergy has already taken to upgrade, change, and/or modify its plant to accommodate the new service as well as dates of the upgrades, changes, and/or modifications.

ANSWER:

ARKANSAS CABLE
TELECOMMUNICATIONS ASSOCIATION;
COMCAST OF ARKANSAS, INC.; BUFORD
COMMUNICATIONS I, L.P. D/B/A
ALLIANCE COMMUNICATIONS NETWORK;
WEHCO VIDEO, INC.; COXCOM, INC.;
AND CEBRIDGE ACQUISITION, L.P., D/B/A
SUDDENLINK COMMUNICATIONS



J. D. Thomas
Dominic F. Perella
Paul A. Werner III
Sharese M. Pryor
Hogan & Hartson L.L.P.
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004-1109
Telephone: (202) 637-5600
Facsimile: (202) 637-5910
jdthomas@hhlaw.com
dfperella@hhlaw.com
pawerner@hhlaw.com
smpryor@hhlaw.com

December 19, 2006

Its Attorneys

CERTIFICATE OF SERVICE

I, Dominic F. Perella, hereby certify that on December 19, 2006, a copy of the foregoing COMPLAINT ARKANSAS CABLE TELECOMMUNICATIONS ASSOCIATION'S SECOND SET OF INTERROGATORIES was hand-delivered, and/or placed in the United States mail, and/or sent via electronic mail, postage prepaid, to:

Marlene H. Dortch (*Orig. & 3 copies*)
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

The Honorable Arthur I. Steinberg **
Administrative Law Judge
Office of the Administrative Law Judge
Federal Communications Commission
445 Twelfth Street, S. W.
Washington, D. C. 20554

Shirley S. Fujimoto, Esquire **
David D. Rines, Esquire
McDermott Will and Emery LLP
600 Thirteenth Street, N.W.
Washington, D.C. 20005

Wm. Webster Darling, Esquire (overnight delivery) **
Entergy Services, Inc.
425 W. Capitol Avenue
P.O. Box 551
Little Rock, Arkansas 72203

Stephen R. Lancaster (overnight delivery)**
WRIGHT, LINDSEY & JENNINGS LLP
200 West Capitol Avenue, Suite 2300
Little Rock, AR 72201-3699


Gordon S. Rather, Jr. (overnight delivery) **
Michelle M. Kaemmerling
Wright, Lindsey & Jennings LLP
200 West Capitol Avenue
Suite 2300
Little Rock, AR 72201-3699

Kris Monteith **
Alex Starr
Lisa Saks
Michael Engel
Federal Communications Commission
Enforcement Bureau
Market Disputes Division
445 Twelfth Street, S. W.
Washington, D. C. 20554

Best Copy and Printing, Inc.
Federal Communications Commission
Room CY-B402
445 12th Street, SW
Washington, D.C. 20554

Federal Energy Regulatory Commission *
888 First Street, NW
Washington, D.C. 20426

Arkansas Public Service Commission *
1000 Center Street
Little Rock, AR 72201


Dominic F. Perella

* Served via U.S. Mail

** Also served via Electronic Mail

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

0 1 9 2006

In the Matter of)	
)	
ARKANSAS CABLE)	
TELECOMMUNICATIONS)	EB Docket No. 06-53
ASSOCIATION; COMCAST OF)	
ARKANSAS, INC.; BUFORD)	
COMMUNICATIONS I, L.P. d/b/a)	
ALLIANCE COMMUNICATIONS)	EB-05-MD-004
NETWORK; WEHCO VIDEO, INC.;)	
COXCOM, INC.; and CEBRIDGE)	
ACQUISITION, L.P., d/b/a SUDDENLINK)	
COMMUNICATIONS,)	
)	
<i>Complainants,</i>)	
)	
v.)	
)	
ENTERGY ARKANSAS, INC.,)	
)	
<i>Respondent.</i>)	
)	

COMPLAINANT ARKANSAS CABLE TELECOMMUNICATIONS
ASSOCIATION'S SECOND SET OF DOCUMENT REQUESTS

Arkansas Cable Telecommunications Association, by and through undersigned counsel, requests that Entergy Arkansas, Inc., answer the following Document Requests separately, fully, in writing and under oath within thirty (30) days of service in accordance with the definitions and instructions set forth below.

DEFINITIONS AND INSTRUCTIONS

1. "Complainants" means Arkansas Cable Telecommunications Association, Comcast of Arkansas, Inc., Buford Communications I, L.P. d/b/a Alliance Communications Network, WEHCO Video, Inc, CoxCom, Inc. and Cebridge Acquisition, L.P., d/b/a Suddenlink Communications.

2. "Entergy" or "EAI" or "Respondent" or "you" or "your" mean Entergy Arkansas, Inc., including subsidiaries, affiliates and parent companies.

3. "Document" as used herein means a document whose existence is known to Entergy, regardless of the document's location, including the original and any copy (regardless of origin) and all drafts of correspondence, records, tables, charts, graphs, pictures, schedules, appointment books and calendars, diaries, reports, memoranda, notes, letters, booklets, circulars, bulletins, notices, instructions, minutes and other communications, including E-mail messages or correspondence and electronically stored materials of any type, video or audio tapes or CD ROMs and computer disks, interoffice and intraoffice communications, questionnaires, data sheets or data processing cards, surveys and other written, recorded, printed, typed and transcribed matter, or other matter of any kind or nature however produced or reproduced, and each copy of any of the foregoing which is not identical because of marginal notations or otherwise. This definition and these instructions also include downloading any documents or data bases from computers into hard copy or paper printouts. If any such document was, but no

longer is, in Entergy's possession, custody or control, state what disposition was made of it and when.

4. "Possession, custody or control" includes the joint or several possession, custody and control by each or any other person in the employ of, or acting on behalf of, Entergy, whether as attorney, agent, official, sponsor, spokesperson, employee or otherwise.

5. "Relate(s)(d) to" means supports, evidences, describes, mentions, memorializes, constitutes or refers to.

6. "Or" shall be read as inclusively as possible, to include "or," "and," and "both."

7. "ACTA" shall mean Complainant Arkansas Cable Telecommunications Association.

8. If any document called for in these requests is withheld on the basis of a claim of privilege, please set forth the nature of the information with respect to which the privilege is claimed, together with the type of privilege claimed, a statement of all the circumstances on which Entergy will rely to support such a claim of privilege, the date and topic of the document, and a list of those in the possession, custody or control of such document or copies thereof.

9. If any document called for in these requests is withheld pursuant to an objection, state the basis for the objection and produce those documents to which the objection does not apply. Without limiting the generality of the foregoing, if any document called for in these requests is withheld pursuant to an objection as to the

period for which information is requested, state the basis for the objection and produce those documents for the period to which the objection does not apply.

10. Each document produced pursuant to these requests shall be separated and labeled so that it is clear as to which particular request the documents relate. In the event that a document is relevant to multiple requests, it is only necessary to produce said document once and to identify it as being responsive to each request to which it responds.

11. In producing the documents requested herein, please produce them in their original file folders, if any, or in lieu thereof, attach to the set of documents produced from a given file a photographic or electrostatic duplicate of all written or printed material on the original file folder. In addition, the documents shall be produced in the same sequence as they are contained or found in the original file folder. The integrity and internal sequence of the requested documents within each folder shall not be disturbed. Under no circumstances shall documents from any file folder be commingled with documents from any other file folder.

12. If any document, or any part of a document, called for in any request has been destroyed, discarded, lost or otherwise disposed of, or placed beyond your possession, custody, or control, you are requested to provide a list setting forth each such document. Such list shall include identification of the author, recipient, date, and description of each document and an explanation of why the document is no longer in your possession, custody, or control. With specific reference to destroyed documents, the list shall include whether the destruction of the listed document was

inadvertent or intentional and, if the destruction was intentional, whether the destruction was part of a company policy relating to the destruction of documents.

13. After answering these requests, if additional documents responsive to these requests become known to Entergy but not produced with prior responses, Entergy is requested to promptly further supplement its response to these requests.

DOCUMENT REQUESTS

1. Identify and produce all documents responsive to Complainants' First Set of Interrogatories submitted to EAI on June 20, 2006, not previously produced.

2. Identify and produce all documents relied upon, referred to or used in any way to respond to Complainant Arkansas Cable Telecommunications Association's Second Set of Interrogatories submitted to EAI on December 19, 2006 in this matter.

3. Identify and produce a copy of EAI's document retention or destruction policies.

4. Identify and produce copies of all company organizational information including but not limited to organizational charts, a list of names, titles, contact information, and job descriptions and duties.

5. Identify and produce all instructions or other material advising Entergy field personnel and/or contractors about procedures for inspecting, clearing, grandfathering, and submitting work requests to clear violations.

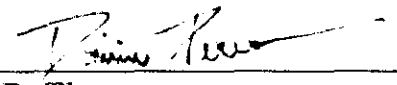
6. Identify and produce field notes that were made by EAI field inspectors that were used in the creation of the spreadsheets that were attached to the Gary Bettis letters produced in your initial production, Bates No. EAI010005813 - EAI010006361.

7. Identify and produce fax cover sheets and other material indicating completion of work to correct EAI Violations.

8. Identify and produce any and all materials related to Entergy providing Broadband Over Power Line ("BPL") service.

9. Identify and produce any and all documents, not previously produced, related to the above-captioned proceeding.

ARKANSAS CABLE
TELECOMMUNICATIONS ASSOCIATION;
COMCAST OF ARKANSAS, INC.; BUFORD
COMMUNICATIONS I, L.P. D/B/A
ALLIANCE COMMUNICATIONS NETWORK;
WEHCO VIDEO, INC.; COXCOM, INC.;
AND CEBRIDGE ACQUISITION, L.P., D/B/A
SUDDENLINK COMMUNICATIONS



J. D. Thomas
Dominic F. Perella
Paul A. Werner III
Sharese M. Pryor
Hogan & Hartson L.L.P.
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004-1109
Telephone: (202) 637-5600
Facsimile: (202) 637-5910

jdthomas@hhlaw.com
dfperella@hhlaw.com
pawerner@hhlaw.com
smprior@hhlaw.com

December 19, 2006

Its Attorneys

CERTIFICATE OF SERVICE

I, Dominic F. Perella, hereby certify that on December 19, 2006, a copy of the foregoing COMPLAINANT ARKANSAS CABLE TELECOMMUNICATIONS ASSOCIATION'S SECOND SET OF DOCUMENT REQUESTS was hand-delivered, and/or placed in the United States mail, and/or sent via electronic mail, postage prepaid, to:

Marlene H. Dortch (*Orig. & 3 copies*)

Secretary

Federal Communications Commission

445 12th Street, S.W.

Room TW-A325

Washington, D.C. 20554

The Honorable Arthur I. Steinberg **

Administrative Law Judge

Office of the Administrative Law Judge

Federal Communications Commission

445 Twelfth Street, S. W.

Washington, D. C. 20554

Shirley S. Fujimoto, Esquire **

David D. Rines, Esquire

McDermott Will and Emery LLP

600 Thirteenth Street, N.W.

Washington, D.C. 20005

Wm. Webster Darling, Esquire (overnight delivery) **

Entergy Services, Inc.

425 W. Capitol Avenue

P.O. Box 551

Little Rock, Arkansas 72203

Stephen R. Lancaster (overnight delivery)**

WRIGHT, LINDSEY & JENNINGS LLP

200 West Capitol Avenue, Suite 2300

Little Rock, AR 72201-3699

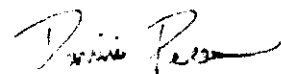
Gordon S. Rather, Jr. (overnight delivery) **
Michelle M. Kaemmerling
Wright, Lindsey & Jennings LLP
200 West Capitol Avenue
Suite 2300
Little Rock, AR 72201-3699

Kris Monteith **
Alex Starr
Lisa Saks
Michael Engel
Federal Communications Commission
Enforcement Bureau
Market Disputes Division
445 Twelfth Street, S. W.
Washington, D. C. 20554

Best Copy and Printing, Inc.
Federal Communications Commission
Room CY-B402
445 12th Street, SW
Washington, D.C. 20554

Federal Energy Regulatory Commission *
888 First Street, NW
Washington, D.C. 20426

Arkansas Public Service Commission *
1000 Center Street
Little Rock, AR 72201



Dominic F. Perella

* Served via U.S. Mail

** Also served via Electronic Mail

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Arkansas Cable Telecommunications)	EB Docket No. 06-53
Association; Comcast of Arkansas, Inc.;)	
Buford Communications I, L.P. d/b/a)	
Alliance Communications Network;)	
WEHCO Video, Inc.; and TCA Cable)	EB-05-MD-004
Partners d/b/a Cox Communications,)	
)	
<i>Complainants,</i>)	
)	
v.)	
)	
Entergy Arkansas, Inc.,)	
)	
<i>Respondent.</i>)	

FILED/ACCEPTED
JAN 18 2007
Federal Communications Commission
Office of the Secretary

To: Office of the Secretary
Attn: The Honorable Arthur I. Steinberg
Administrative Law Judge

**ANSWERS TO COMPLAINANT ARKANSAS CABLE TELECOMMUNICATIONS
ASSOCIATION'S SECOND SET OF INTERROGATORIES**

Entergy Arkansas, Inc. ("EAI"), for its responses to Complainant Arkansas Cable Telecommunications Association's ("ACTA") second set of interrogatories, states as follows:

GENERAL OBJECTIONS

EAI's responses are subject to, qualified by, and limited by the following General Objections which apply to each specific interrogatory as if incorporated and set out in full in response to each.

1. EAI generally objects to each interrogatory to the extent it requires EAI to provide information not within its possession, custody, or control.

2. EAI generally objects to any interrogatory that calls for information not within its present knowledge or which seeks to require EAI to offer a narrative of its case.

3. EAI generally objects to the interrogatories to the extent that they are unreasonably cumulative or duplicative and to the extent that the information requested is already within the possession of Complainants or is otherwise obtainable from some other source that is more convenient, less burdensome, or less expensive.

4. EAI generally objects to the interrogatories to the extent that they seek discovery of information that is not relevant to any claim or defense raised by Complainants or EAI and/or where the burden or expense of the proposed discovery would outweigh any benefit to ACTA of the discovery.

5. EAI generally objects to the interrogatories to the extent that they seek discovery of pure legal conclusions or contentions without any application to specific facts. Further, to the extent that any interrogatory seeks discovery of EAI's legal contentions in relation to specific facts, EAI objects to the interrogatory as being premature.

6. EAI generally objects to ACTA's interrogatories to the extent that they seek information or production of documents protected by the attorney-client privilege, the work product doctrine, the party communication privilege, or any other legally recognized privilege, immunity, or doctrine.

7. EAI generally objects to ACTA's interrogatories to the extent that they seek information or documents protected from disclosure by a third party confidentiality agreement, statute, regulation, administrative order, or case law.

8. EAI generally objects to ACTA's interrogatories insofar as they seek confidential and/or proprietary information. To the extent not otherwise objectionable or containing trade secrets, EAI will respond or produce documents or other materials which contain confidential

and/or proprietary information consistent with the Stipulated Confidentiality Agreement governing use of such documents and information as approved by the Administrative Law Judge.

9. EAI generally objects to any instruction, definition, interrogatory, or request to the extent it attempts to impose obligations on EAI greater than those established by the rules of the Federal Communications Commission, 47 C.F.R. §§ 1.311 through 1.325.

10. EAI submits these responses and will respond to ACTA's interrogatories without conceding the relevancy or materiality of the subject matter of any interrogatory or request or document, and without prejudice to EAI's right to object to further discovery, or to object to the admissibility of any additional proof on the subject matter of any document or response at the time of the formal hearing of this proceeding before the Administrative Law Judge. EAI reserves the right to supplement any response herein at any time and in accordance with the Administrative Law Judge's order issued April 20, 2006, FCC 06M-09.

11. EAI's responses below that it will produce certain documents in response to interrogatories should be taken not as representations that such documents exist but as an undertaking to locate and produce relevant, non-privileged documents, if they exist and can be found.

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

1. Please identify each person who assisted in the formulation of the answers to each interrogatory in this Second Set of Interrogatories. Please provide each person's name, address, and official position or relationship with the party to whom the interrogatories are directed.

ANSWER: Subject to and without waiving the above general objections, EAI responds as follows: Wm. Webster Darling and additional counsel of record for EAI.

2. Please state whether EAI field inspectors had instructions to clear all violations on a pole or span as opposed to only addressing the plant conditions that the USS inspection specifically noted when EAI field inspectors were sent to field with EAI violations that USS had detected.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, vague, unclear, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above general and specific objections, EAI responds as follows: In addition to visual inspection of violations which EAI was responsible for correcting as reported by USS, engineering associates also reported any other conditions observed by them related to EAI's electric facilities which required correction, regardless of whether a condition was located on any specific pole, pole span or distribution circuit.

3. Please describe in detail EAI's plans to provide Broadband Over Power Line ("BPL") service. Please include in your answer what steps Entergy has already taken to upgrade, change, and/or modify its plant to accommodate the new service as well as dates of the upgrades, changes, and/or modifications.

ANSWER: Objection. EAI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and requests information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above and general objections, EAI responds as follows: The information sought by Complainant ACTA is not an issue designated for hearing and is not related to the issues designated for hearing. The limited project involving BPL did not begin until the fourth quarter of 2006 well after the safety inspections had been performed by USS and safety violations had been reported to the Complainant cable TV operators.

Respectfully submitted,



Shirley S. Fujimoto
David D. Rines
McDERMOTT WILL & EMERY LLP
600 Thirteenth Street, N.W.
Washington, D.C. 20005-3096
T: 202.756.8000
F: 202.756.8087

Gordon S. Rather, Jr.
Michelle M. Kaemmerling
Stephen R. Lancaster
WRIGHT, LINDSEY & JENNINGS LLP
200 West Capitol Avenue, Suite 2300
Little Rock, AR 72201-3699
T: 501.371.0808
F: 501.376.9442

Wm. Webster Darling
Janan Honeysuckle
Entergy Services, Inc.
425 West Capitol Avenue
27th Floor
Little Rock, AR 72201
T: 501.377.5838
F: 501.377.5814

Attorneys for Entergy Arkansas, Inc.

Dated: January 18, 2007

CERTIFICATE OF SERVICE

I, David Rines, do hereby certify that on this 15th day of January, 2007, a single copy (unless otherwise noted) of the foregoing "Answers to Complainant Arkansas Cable Telecommunications Association's Second Set of Interrogatories" was delivered to the following by the method indicated:

Marlene H. Dortch (hand delivery) **(ORIGINAL PLUS 3 COPIES)**

Secretary

Federal Communications Commission

445 12th Street, S.W., Room TW-A325

Washington, D.C. 20554

Hon. Arthur I. Steinberg (overnight delivery, fax, e-mail)

Administrative Law Judge

Office of the Administrative Law Judge

Federal Communications Commission

445 12th Street, S.W.

Washington, DC 20554

Fax: (202) 418-0195

John Davidson Thomas (hand-delivery, e-mail)

Paul Werner, III

Sharese M. Pryor

Hogan & Hartson LLP

Columbia Square

555 13th Street, N.W.

Washington, D.C. 20004

Kris Monteith, Bureau Chief (overnight delivery, e-mail)

Alex Starr

Lisa Saks

Michael Engel

Federal Communications Commission

Enforcement Bureau

Market Dispute Resolutions Division

445 12th Street, S.W.

Washington, DC 20554

Best Copy and Printing, Inc. (U.S. Mail)

Federal Communications Commission

Room CY-B402

445 12th Street, S.W.

Washington, D.C. 20554

Federal Energy Regulatory Commission (U.S. Mail)
888 First Street, N.E.
Washington, D.C. 20426

Arkansas Public Service Commission (U.S. Mail)
1000 Center Street
Little Rock, AR 72201



David Rines

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Arkansas Cable Telecommunications)	EB Docket No. 06-53
Association; Comcast of Arkansas, Inc.;)	
Buford Communications I, L.P. d/b/a)	
Alliance Communications Network;)	
WEHCO Video, Inc.; and TCA Cable)	EB-05-MD-004
Partners d/b/a Cox Communications,)	
)	
<i>Complainants,</i>)	
)	
v.)	
)	
Entergy Arkansas, Inc.,)	
)	
<i>Respondent.</i>)	

FILED/ACCEPTED

JAN 18 2007

Federal Communications Commission
Office of the Secretary

To: Office of the Secretary
Attn: The Honorable Arthur I. Steinberg
Administrative Law Judge

**RESPONSES TO COMPLAINANT ARKANSAS CABLE TELECOMMUNICATIONS
ASSOCIATION'S SECOND SET OF DOCUMENT REQUESTS**

Entergy Arkansas, Inc. ("EAI"), for its responses to complainant Arkansas Cable Telecommunications Association's ("ACTA") second set of document requests, states as follows:

GENERAL OBJECTIONS

EAI's responses are subject to, qualified by, and limited by the following General Objections which apply to each specific document request as if incorporated and set out in full in response to each.

1. EAI generally objects to each document request to the extent it requires EAI to provide information not within its possession, custody, or control.

2. EAI generally objects to any document request that calls for information not within its present knowledge or which seeks to require EAI to offer a narrative of its case.

3. EAI generally objects to the document requests to the extent that they are unreasonably cumulative or duplicative and to the extent that the information requested is already within the possession of Complainants or is otherwise obtainable from some other source that is more convenient, less burdensome, or less expensive.

4. EAI generally objects to the document requests to the extent that they seek discovery of information that is not relevant to any claim or defense raised by Complainants or EAI and/or where the burden or expense of the proposed discovery would outweigh any benefit to ACTA of the discovery.

5. EAI generally objects to the document requests to the extent that they seek discovery of pure legal conclusions or contentions without any application to specific facts. Further, to the extent that any document request seeks discovery of EAI's legal contentions in relation to specific facts, EAI objects to the document request as being premature.

6. EAI generally objects to ACTA's document requests to the extent that they seek information or production of documents protected by the attorney-client privilege, the work product doctrine, the party communication privilege, or any other legally recognized privilege, immunity, or doctrine.

7. EAI generally objects to ACTA's document requests to the extent that they seek information or documents protected from disclosure by a third party confidentiality agreement, statute, regulation, administrative order, or case law.

8. EAI generally objects to ACTA's document requests insofar as they seek confidential and/or proprietary information. To the extent not otherwise objectionable or